

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: KASEY JAY KIRK Debtor	: : : : : : : : :	CHAPTER 13 CASE NO. 1:23-bk-00436
MIDFIRST BANK Movant	: : : : : : : : :	
vs. KASEY JAY KIRK Respondent	: : : : : : : : :	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied as stated. The mortgage company informed Debtor that he did not need to make a payment until August 2023 due to his hardship.
7. Denied as stated. The mortgage company informed Debtor that he did not need to make a payment until August 2023 due to his hardship.
8. Denied. The mortgage company is protected by an equity cushion of at least \$20,000.00 and the Debtor anticipates a disability payment at the end of the month which he intends to use to cure the mortgage.
9. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
10. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the sam

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

Kara K. Gendron, Esquire
Attorney ID #87577
MOTT & GENDRON LAW
125 State Street
Harrisburg, PA 17101
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477
karagendron@gmail.com